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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

In re: Fight Pass Auto-Renewal Litigation

This Document Relates To: All Actions

) Case No. 2:23-cv-00802-CDS-EJY

) Member Case Nos: 2:23-cv-01211-CDS-EJY
) 2:23-cv-01259-CDS-EJY

) **JOINT STIPULATION TO EXTEND**
) **DEFENDANTS' RESPONSE DEADLINE**
) **TO PLAINTIFFS' CONSOLIDATED**
) **COMPLAINT [ECF 71] PENDING**
) **MEDIATION; ~~PROPOSED~~ ORDER**

) **(Second Request)**

1 Pursuant to LR IA 6-1, Plaintiffs Moises Reza, Frank Garza, Tanner Pendergraft, Federico
2 Navarrete, Isaiah Sanchez and Saul Garcia and Defendants Zuffa, LLC, (“Zuffa”) and NeuLion
3 USA, LLC, by and through their undersigned counsel of record in this matter, stipulate and agree as
4 follows:

5 WHEREAS, on October 11, 2022, Plaintiffs filed this action in the Superior Court of the
6 State of California, for the County of Alameda, entitled Moises Reza, Frank Garza, Tanner
7 Pendergraft, and Federico Navarrete, on behalf of themselves, all others similarly situated, against
8 Zuffa, LLC a Nevada limited liability company; and NeuLion USA, LLC, a Delaware limited
9 liability company, and DOES 1-50, inclusive, Case No. 22cv019499 (the “Complaint”);

10 WHEREAS, Plaintiffs filed a Consolidated Class Action Complaint (“CAC”) in the United
11 States District Court for the District of Nevada on December 8, 2023 [ECF 71];

12 WHEREAS, on January 8, 2024, the Court granted the parties’ stipulation to extend
13 Defendants’ response deadline to the CAC to March 6, 2024 [ECF. 73];

14 WHEREAS, on February 26, 2024, the parties mediated with Hon. Peggy A. Leen [Ret.];

15 WHEREAS, the parties continue to engage in settlement discussions as a result of the progress
16 made at the mediation with Honorable Leen;

17 WHEREAS, Honorable Leen continues to facilitate the parties’ discussions;

18 WHEREAS, the parties have reached a second stipulation and agreed upon a briefing schedule
19 for responding to the CAC, subject to approval of the Court;

20 WHEREAS, postponing the parties’ briefing schedule an additional two weeks, will facilitate
21 and allow the parties to potentially expedite resolution of this complicated, putative class action case,
22 avoid burdening the Court with potentially unnecessary briefing, and are hopeful Honorable Leen
23 will assist in streamlining and/or resolving remaining issues in dispute;

24 WHEREAS, this joint stipulation shall not be deemed a waiver of any rights or defenses by
25 any party, including, but not limited to, the right of Defendants to raise jurisdiction issues or to file
26 any motion to dismiss, or any other motion, or for Plaintiffs to oppose such motions;

1 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between Plaintiffs and
2 Defendants respective counsel, that:

- 3 1. Defendants' response to the Consolidated Class Action Complaint currently due March 6,
4 2024, is vacated and in the event the parties' continued discussions are unsuccessful,
5 Defendants shall file any motion to dismiss or response on or before Wednesday, March
6 20, 2024;
- 7 2. The deadline for filing any opposition and reply briefs, and selection of a hearing date,
8 shall follow the Local Rules and applicable Standing Orders of this Court.

9
10 Dated: March 4, 2024

HOLLAND & KNIGHT LLP

11 s/ Dan Kappes

12 Attorneys for Defendants
Zuffa, LLC and NeuLion USA, LLC

13
14 Dated: March 4, 2024

CROSNER LEGAL

15 s/Chad Saunders

16 Attorneys for Plaintiffs Moises Reza, Frank Garza,
Tanner Pendergraft

17 Dated: March 4, 2024

BURSOR & FISHER, P.A

18 s/Timothy Fisher

19 Attorneys for Plaintiff Isaiah Sanchez

20 Dated: March 4, 2024

ZIMMERMAN REED LLP

21 s/Zachary Freese

22 Attorneys for Plaintiff Saul Garcia

23
24 **IT IS SO ORDERED:**

25 Clayton J. Zouchak
UNITED STATES MAGISTRATE JUDGE

26 DATED: March 4, 2024